

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

CARLOS RAY NORRIS,  
a/k/a CHUCK NORRIS, an individual,  
  
Plaintiff,  
  
v.  
  
PENGUIN GROUP (USA), INC., et al.,  
  
Defendants.

Civil Action No.: 07 CV 11480 (RWS)

**MOTION TO ADMIT COUNSEL**  
**PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the this Court, I, Deborah M. Lodge, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name: SUSAN E. BILLHEIMER

Firm Name: Patton Boggs, LLP

Address: 2550 M Street, N.W.

City/State/Zip: Washington, D.C. 20037

Phone Number: (202) 457-5316

Fax Number: (202) 457-6315

Email Address: sbillheimer@pattonboggs.com

SUSAN E. BILLHEIMER is a member in good standing of the Bar of the State of California (Bar Number 233190). A certificate of attesting to that is annexed.

There are no pending disciplinary proceedings against SUSAN E. BILLHEIMER in any State or Federal court.

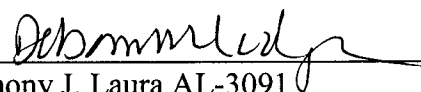
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U.S. DISTRICT COURT  
2008 FEB 15 PM 3:39  
S.D. OF N.Y.

64494 \$25 2-15-08

Dated: February 14, 2008  
Washington, D.C.

Respectfully submitted,

PATTON BOGGS LLP

By:   
Anthony J. Laura AL-3091  
Deborah M. Lodge DL-8774

1185 Avenue of the Americas  
30<sup>th</sup> Floor  
New York, NY 10036  
(646) 557-5100

2550 M Street, N.W.  
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(202) 457-6030  
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*Attorneys for Plaintiff*

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Plaintiff, )  
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PENGUIN GROUP (USA), INC., et al., )  
 )  
Defendants. )  
\_\_\_\_\_ )

Civil Action No.: 07 CV 11480 (RWS)

**AFFIDAVIT OF DEBORAH M. LODGE IN SUPPORT OF**  
**MOTION TO ADMIT COUNSEL PRO HAC VICE**

Deborah M. Lodge, being duly sworn, hereby deposes and says as follows:


1. I am Partner at Patton Boggs, LLP, counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Susan E. Billheimer as counsel pro hac vice to represent Plaintiff in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1978. I am also admitted to the bar of the United States District Court for the Southern District of New York, and I am in good standing with this Court.
3. I have known Susan E. Billheimer since 2007.
4. Ms. Billheimer is an Associate at Patton Boggs, LLP, in Washington, D.C.
5. I have found Ms. Billheimer to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Susan E. Billheimer, pro hac vice.
7. I respectfully submit a proposed order granting the admission of Susan E. Billheimer, pro hac vice, which is attached hereto.

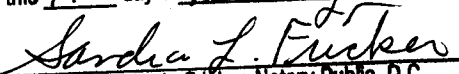
WHEREFORE it is respectfully requested that the motion to admit Susan E. Billheimer, pro hac vice, to represent Plaintiff in the above captioned matter, be granted.

Dated: February 14, 2008  
Washington, D.C.

Notarized:

Respectfully submitted,

  
Deborah M. Lodge  
SDNY Bar: DL-8774

District of Columbia : SS  
Subscribed and Sworn to before me, in my presence,  
this 14<sup>th</sup> day of February, 2008  
  
Sandra L. Fricker, Notary Public, D.C.  
My commission expires August 31, 2009



THE  
STATE BAR  
OF CALIFORNIA

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180 HOWARD STREET  
SAN FRANCISCO, CALIFORNIA 94105-1639  
TELEPHONE (415) 538-2000

January 30, 2008

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, SUSAN EILEEN BILLHEIMER, #233190 was admitted to the practice of law in this state by the Supreme Court of California on December 1, 2004; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Kath Lambert  
Custodian of Membership Records

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**ORDER FOR ADMISSION**  
**PRO HAC VICE ON WRITTEN MOTION**

Upon the motion of Deborah M. Lodge attorney for Carlos Ray Norris a/k/a Chuck Norris, an individual, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name: SUSAN E. BILLHEIMER

Firm Name: Patton Boggs, LLP

Address: 2550 M Street, N.W.

City/State/Zip: Washington, D.C. 20037

Telephone/Fax: (202) 457-5316/(202) 457-6315

Email Address: sbillheimer@pattonboggs.com

is admitted to practice pro hac vice as counsel for Carlos Ray Norris a/k/a Chuck Norris, an individual, in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the

Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECP password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of the Court.

Dated: \_\_\_\_\_

New York, NY

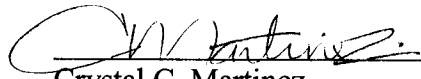
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Honorable, Judge Robert W. Sweet  
U.S. District Judge of SDNY

**CERTIFICATE OF SERVICE**

I hereby certify that on February 14<sup>th</sup>, 2008 I served a true copy of the foregoing  
MOTION TO ADMIT COUNSEL PRO HAC VICE upon the following persons by United  
States First Class Mail, postage prepaid:

Mr. Dean Ringel, Esq.  
Cahill Gordon & Reindel LLP  
80 Pine Street  
New York, NY 10005

  
Crystal C. Martinez  
Paralegal

PATTON BOGGS LLP  
2550 M Street, NW  
Washington, DC 20037  
(202) 457-6175